

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: §
FREE SPEECH SYSTEMS, LLC, § **Case No. 22-60043**
DEBTOR. § **(Subchapter V Debtor)**
§ **Chapter 11**

**WITNESS AND EXHIBIT LIST
FOR HEARINGS ON FEBRUARY 14, 2023**

Judge:	Hon. Christopher M. Lopez
Hearing Date:	Tuesday, February 14, 2023
Hearing Time:	1:00 p.m. (CT)
Party's Name:	Free Speech Systems, LLC
Attorney's Name:	Raymond W. Battaglia,
Attorney's Phone:	(210) 601-9405;
Nature of Proceeding:	<p>Hearing on:</p> <ul style="list-style-type: none"> • Motion to Authorize the Use of Cash Collateral [Docket No. 6] • Emergency Motion to Approve Assumption of Commercial Real Property Lease with BCC UBC LLC. [Docket No. 412] • Emergency Motion to Approve Sale of Warehouse Racks and Related Property [Docket No. 429] • Motion for Relief from the Automatic Stay against Free Speech Systems, LLC [Docket No. 406]

The Law Offices of Raymond W. Battaglia (the “**Battaglia Firm**”), bankruptcy counsel for Free Speech Systems, LLC (the “**Debtor**”) in the above-captioned chapter 11 case (the “Chapter 11 Case”), hereby submit this witness and exhibit list in connection with the hearings to be held on Tuesday, February 14, 2023, at 1:00 P.M. (Central Time) (the “Hearing”) on the matters listed above.

WITNESSES

The Debtor may call any of the following witnesses at the Hearing, whether in person or by proffer:

1. Patrick Magill, Chief Restructuring Officer of Free Speech Systems, LLC;
2. Andino Reynal, Special Counsel for Free Speech Systems, LLC;
3. Any witnesses necessary to establish notice of the Hearing has been provided; and
4. Any witnesses necessary to rebut the testimony of any witnesses called or designated by any other parties.

EXHIBITS

The Debtor may offer for admission into evidence any of the following exhibits at the hearing:

Ex.	Description	Offered	Objection	Admitted /Not Admitted	Disposition
1	Cash Collateral Budget				

The Debtor reserves the right to supplement, amend or delete any witness and exhibits prior to the Hearing. The Debtor also reserves the right to use any exhibits presented by any other party and to ask the Court to take judicial notice of any document. The Debtor finally reserves the right to introduce exhibits previously admitted.

Respectfully submitted February 9, 2023.

LAW OFFICES OF RAY BATTAGLIA, PLLC

/s/ RAYMOND W. BATTAGLIA
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Counsel to the Debtor and Debtor-In-Possession

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system.

/s/ Raymond W. Battaglia
Raymond W. Battaglia